

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DEBORAH DONOGHUE,)

Plaintiff,)

- against -)

LOCAL.COM CORPORATION and HEARST
COMMUNICATIONS, INC.,)

Defendants.)
----- X

Case Number: 07 CIV. 8550 (LBS)

**NOTICE OF MOTION OF
SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that, upon this Notice of Motion, the accompanying Memorandum of Law in support thereof, all papers in support of Defendant Hearst Communications' ("Hearst's") Motion for Judgment on the Pleadings in this action, the hearing of Hearst's Motion for Judgment on the Pleadings before this Court on March 13, 2008, the Stipulated Order of the Court on June 17, 2008 converting Hearst's Motion for Judgment on the Pleadings to a Motion for Summary Judgment, the Declaration of William Wargo, dated July 16, 2008, and attached exhibits, all pleadings and papers on file in this action, and such other evidence and argument which may be presented at the hearing on this motion (if any), Hearst before the Honorable Leonard B. Sand, United States District Court Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 15-A, New York, New York, moves for summary judgment on the First Amended Complaint ("FAC"), pursuant to Fed. R. Civ. P. Rules 56, dismissing the FAC in this action as to Hearst in its entirety, and such other and further relief as the Court deems just and proper.

Pursuant to the order of this Court and stipulation of Hearst and Plaintiff, any papers in opposition to this Motion must be filed and served on or before July 30, 2008.

Dated: July 16, 2008
New York, New York

GREENBERG TRAURIG, LLP

By: /s/ William Wargo

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